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| 8  | CHRISTOPHER HALL Assistant Branch Director                                  |   |
| 9  | JAMES D. TODD, JR.<br>Senior Trial Counsel                                  |   |
| 10 | YURI S. FUCHS<br>GREGORY CONNER   |   |
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| 13 | Washington, DC 20044  |   |
| 14 | Counsel for Defendants  |   |
| 15 | (Counsel for other parties listed on signature page                         | ge)   |
| 16 |   |   |
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| 18 |   |   |
|    | UNITED STATES I<br>FOR THE NORTHERN DIS                                     |   |
| 19 | SAN FRANCIS   |   |
| 20 |   | ٦   |
| 21 | AMERICAN FEDERATION OF  |   |
| 22 | GOVERNMENT EMPLOYEES, et al.  | Case No. 3:25-cv-1780-WHA                           |
| 23 | Plaintiffs,   | STIPULATION AND [PROPOSED]                          |
| 24 | v.  | ORDER RE: DEFENDANTS' ADMINISTRATIVE MOTION TO FILE |
| 25 | UNITED STATES OFFICE OF PERSONNEL   | UNDER SEAL  |
| 26 | MANAGEMENT, et al.,   |   |
|    | Defendants.   |   |
| 27 |   |   |
| 28 |   |   |

Stipulation and [Proposed] Order Re: Defendants' Administrative Motion to File Under Seal 3:25-cv-1780-WHA

Pursuant to Civil Local Rule 7-11, 7-12, and 79-5, the parties hereby stipulate and respectfully request that the Court grant Defendants' Administrative Motion to File Under Seal and permit unredacted copies of the following documents to be filed under seal to protect the personal identifying information of the federal employees identified therein and to comply with this Court's April 18, 2025 preliminary injunction:

- 1. U.S. Department of Agriculture's declaration providing details of employees whose terminations were carried out after an individualized evaluation of their performance.
- 2. U.S. Department of Defense's declaration providing details of employees whose terminations were carried out after an individualized evaluation of their performance.
- 3. U.S. Department of Defense's list of employees whose terminations were carried out after an individualized evaluation of their performance.
- 4. U.S. Department of Energy's unredacted declaration providing details of employees whose terminations were carried out after an individualized evaluation of their performance.
- 5. U.S. Department of State's unredacted declaration providing details of employees whose terminations were carried out after an individualized evaluation of their performance.
- 6. U.S. Veterans' Administration's declaration providing details of employees whose terminations were carried out after an individualized evaluation of their performance.
- 7. U.S. Veterans' Administration's declaration providing details of one employee whose termination was carried out after an individualized evaluation of that employee's performance.
- 8. National Science Foundation's list of one employee terminated on an individualized basis.

| 1  | DATED: May 8, 2025  |   |
|----|---|---|
| 2  | Respectfully submitted,   |   |
| 3  | Scott A. Kronland (SBN 171693)  | PATRICK D. ROBBINS (CABN 152288   |
| 4  | Stacey M. Leyton (SBN 203827)<br>Eileen B. Goldsmith (SBN 218029)                   | Acting United States Attorney PAMELA T. JOHANN (CABN 145558)              |
| 5  | Danielle E. Leonard (SBN 218201)<br>Robin S. Tholin (SBN 344845)                    | Chief, Civil Division<br>KELSEY J. HELLAND (CABN 298888)                  |
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| 13 | Attorney for Plaintiff American Federation of Government Employees                  | <u>s/ Yuri S. Fuchs</u><br>YURI S. FUCHS                                  |
| 14 | s/ Teague Paterson  | GREGORY CONNER Trial Attorneys  |
| 15 | Teague Paterson (SBN 226659)<br>Matthew Blumin (pro hac vice)                       | U.S. DEPARTMENT OF JUSTICE  |
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| 18 | Washington, D.C. 20036  | Counsel for Defendants  |
| 19 | Attorneys for Plaintiff American Federation of State County and Municipal Employees |   |
| 20 |   |   |
| 21 | <u>s/ Tera M. Heintz</u><br>  Tera M. Heintz (SBN 241414)                           |   |
| 22 | Cristina Sepe (SBN 308023)<br>Cynthia Alexander, WA Bar No. 46019 (pro              |   |
| 23 | hac vice) Deputy Solicitors General   |   |
| 24 | OFFICE OF THE WASHINGTON STATE<br>ATTORNEY GENERAL                                  |   |
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| 26 | Attorneys for Plaintiff State of Washington   |   |
| 27 |   |   |
| 28 |   |   |

## [PROPOSED] ORDER

Senior United States District Judge

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: September 12, 2025

Stipulation and [Proposed] Order Re: Defendants' Administrative Motion to File Under Seal 3:25-cv-1780-WHA